

KP

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Randy Washington

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

1:16-cv-7731

Judge Edmond E. Chang

Magistrate Judge Young B. Kim
PC5

Thomas J. Dart, Sheriff
of Cook County and
Cook County, ILLINOIS

RECEIVED

JUL 29 2016

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

AMENDED COMPLAINT

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

Reviewed: 8/2013

I. Plaintiff(s):

- A. Name: RANDY Washington
- B. List all aliases: N/A
- C. Prisoner identification number: 2015-0629269
- D. Place of present confinement: COOK COUNTY Jail ILL
- E. Address: PO. Box 089002 Chicago Ill 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Thomas J. Dart
Title: Sheriff of Cook County
Place of Employment: Cook County Jail Illinois
- B. Defendant: _____
Title: _____
Place of Employment: _____
- C. Defendant: _____
Title: _____
Place of Employment: _____

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Randy Washington vs
Chicago Police. Case # 15C10776
- B. Approximate date of filing lawsuit: NOV-20-2015
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Randy
Washington
- D. List all defendants: OFFICERS AH Kulisek # 15054
MM Cobarrubias # 10768
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District of Illinois
- F. Name of judge to whom case was assigned: Judge Charles R. Norgle
- G. Basic claim made: False arrest and False Imprisonment
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still pending
- I. Approximate date of disposition: N/A

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

At the Cook County Jail Department of Corrections
On January 7, 2015, I Randy Washington 2015-0629269
was a Pretrial detainee returning from court on above
date being found "not guilty" of all Charges therefore
becoming Presently "innocent". Upon being transferred back
to the (Rece) Jail bullpen returning from court I was
Placed in the Jail bullpen with Misdemeanor and Felony
Charged detainees for hours.

I notified Sgt. John Doe correctional officer that
I fear for my life and freedom and that I don't
want to return to my living unit because of my fears
Sgt. John Doe stated "you have to be around
other detainees charged with criminal offense(s)
and you have to return to your housing unit to
be housed until Supervisors call for you to go home"
that's Thomas J. Dart Policy here at Cook County
Dept. of Corrections". I was then transferred to
my housing unit General Population Division 9
unit 2F Shackled in blue Box handcuffs,

Upon entering housing unit I informed the active Sheriff that I fear for my freedom and life Sheriff Stated "you'll be leaving in a few hours you have nothing to worry about. Sheriff then placed me in the cell with a felony charged detainee. I began to pack up all my Property Prepared to go home my cellmate ~~do~~ get aggressive with me because I was happy that I was going home. My cellmate asked me can he get all my commissary because I'm going home I told detainee that I was giving my commissary to somebody else on ^{the} unit detainee began to hit me with a closed fist and tried to choke me I then (Surrendered) because I wanted to be free and I gave him all my commissary items. It took Sheriff John Doe hours to release me from custody. I informed Sheriff of physical altercation Sheriff gave me the go home and forget about it speech. I was send back to bullpen to RDC I was release hours later from Cook County Jail Department of corrections.

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I am asking for Thomas J Dart Pay Compensatory damages Punitive damages Nominal damage ~~50,000~~ 50,000\$
For Thomas J. Dart to Change Policy For NOT Guilty Person(s) in Cook County Jail Dept.
Compensatory. 50,000\$ I'm seeking recovery for Cost in this suit. Any additional relief this court Deems.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 7 day of 1, 2016



(Signature of plaintiff or plaintiffs)

RANDY Washington

(Print name)

2015-0629269

(I.D. Number)

1318 S Kolm Chicago IL 60623

(Address)

Sheriff Thomas J. Dart is the Active Warden over Cook County Dept. of Corrections and Correction officers and instructed his fellow C.O.'s/employees to act on Policies given to male detainees and not female detainees which are equal Protection, Due Process, Failure to Protect, Search and Seizure, were violated upon me being found Not Guilty of all Charges. Sheriff Thomas J. Dart are being held accountable for his violating Policies. Deliberate Indifference to my Security Concern.

Sheriff Thomas J. Dart ~~Policy~~ Policy is unreasonable and unconstitutional manner Sheriff Practice of treating male differently than Situated female Inmate who were found not guilty or otherwise had the charges against them dismissed.

Sheriff Thomas J. Dart fail to Protect 'Innocent' Not Guilty Person from detainees that are still facing criminal charges By making ~~By making~~ 'Innocent' Not Guilty Person(s) be inside bullpen with other detainees that coming from court. that is still facing charge(s) Thomas J. Dart fail to Protect By making 'Innocent' Not Guilty Person go back to (General Population) with other detainees.

Sheriff Thomas J. Dart Policy ~~is~~ IS unreasonable and unconstitution manner for Innocent/ Not Guilty Person.